

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

-against-

**ROBERT J. MUELLER, DEEPROOT FUNDS
LLC (a/k/a dprt Funds, LLC), AND POLICY
SERVICES INC.,**

Defendants,

-and-

**DEEPROOT TECH LLC, DEEPROOT
PINBALL LLC, DEEPROOT STUDIOS LLC,
DEEPROOT SPORTS & ENTERTAINMENT
LLC, DEEPROOT RE 12621 SILICON DR LLC,
AND ROBERT J. MUELLER, JEFFREY L.
MUELLER, AND BELINDA G. BREEN, AS CO-
TRUSTEES OF THE MB HALE OHANA
REVOCABLE TRUST,**

Relief Defendants.

Civil Action No.: 5:21-cv-785-XR

SUGGESTION OF BANKRUPTCY

On December 9, 2021, a Chapter 7 petition was filed in the U.S. Bankruptcy Court for the Western District of Texas, San Antonio Division, by the following defendants:

1. deeproot Tech, LLC (Case No. 21-51520);
2. deeproot Pinball, LLC (Case No. 21-51515); and
3. deeproot Studios, LLC (Case No. 21-51522) (together, "Bankruptcy Defendants").

The Bankruptcy Defendants suggest certain proceedings are stayed under Bankruptcy Code Section 362 to the extent the exemptions under Section 362(b) do not apply.

Date: December 10, 2021

Respectfully submitted,

/s/ Jason M. Rudd

Jason M. Rudd

Tex. Bar No. 24028786

jason.rudd@wickphillips.com

WICK PHILLIPS GOULD & MARTIN, LLP

3131 McKinney Avenue, Suite 500

Dallas, Texas 75204

Telephone: (214) 692-6200

Facsimile: (214) 692-6255

*Attorney for deeproot Tech, LLC, deeproot Pinball,
LLC and deeproot Studios, LLC*

CERTIFICATE OF SERVICE

I certify that on the 10th day of December, 2021, a true and correct copy of the foregoing document was filed electronically through the Court's CM/ECF system, which will send copies to all counsel of record.

/s/ Jason M. Rudd

Jason M. Rudd